

PROGRAM STATEMENT

The proposed station would serve listeners in the city of Baldwin, Florida, and surrounding areas in the Florida counties of Baker, Bradford, Clay, Duval and Nassau--an area being marketed by state and regional authorities as "Florida's First Coast". The station would also serve a small portion of Charlton County, Georgia.

Baldwin is an enclave in the far western portion of the city of Jacksonville, which situation occurred when Jacksonville and theretofore unincorporated areas of Duval County merged. The proposed station would provide a first local broadcast service for Baldwin, and would provide news and information to area listeners about the workings of the city government, police and fire reports, news about local schools and community activities and local and regional news. The station will also serve those areas within the city of Jacksonville west of the St. John's River--the limit of our primary coverage, as well as the surrounding suburban and rural counties identified above.

If the station could commence operations immediately, it would provide a country & western music format and sports programming, along with local news and information, including a daily talk program for the discussion of local issues and interviews with guests relevant to these issues. However, the exact entertainment format will be determined at the time the station commences operations.

FIRST COAST BROADCASTING COMPANY  
NEW FM, BALDWIN, FLORIDA  
EXHIBIT E

ENGINEERING STATEMENT

This engineering statement is prepared on behalf of First Coast Broadcasting Company, in support of its application for a construction permit for a new FM Broadcast Station on 105.7 MHz, Channel 289A, at Baldwin, Florida.

Channel 289A was assigned to Baldwin by the Commission pursuant to a Report and Order in MM Docket No. 87-77, released September 25, 1989.

Proposed Transmitter Location

The transmitting facility is to be located about 1.6 kilometers north of the junction of U. S. Highways 90 West and 301 South, just north of the Baldwin corporate limits, in Duval County, Florida. The tower will be located in the northeast corner of a 160 acre tract described as the northeast 1/4 of Section 22, Town 2 North, Range 23 East, in Duval County. The site is described uniquely by the following geographic coordinates which were determined from the U.S.G.S. 7-1/2' series quadrangle map entitled "Baldwin, Florida":

30° 19' 01"	North Latitude
81° 59' 03"	West Longitude

Said quadrangle map, showing the proposed transmitter location, is attached hereto as Figure E-2.

#### Proposed Operation

The proposed station would use type-accepted equipment throughout, and will use a combination of transmitter power, transmission line and antenna to yield an effective radiated power of 6.0 kW, horizontal and vertical.

The tower would consist of a steel, uniform cross-section, 24" face structure, which with a top-mounted aviation beacon would measure 104 meters above the ground. The proposed antenna, a two-bay antenna, would be 6.0 meters (19.6 feet) in length, would be side-mounted to one of the faces of the tower, with the top of the antenna even with the top of the tower (not including beacon). A sketch of the proposed tower is included as Figure E-1.

This would permit a center of radiation 100 meters above average terrain. The center of radiation would be 123 meters above mean sea level, and 100 meters above the ground.

#### Coverage Contours

The predicted coverage contours were calculated in accordance with Section 73.313 of the Commission's Rules.

Elevation data from 3 to 16 kilometers from the transmitting site on the eight principal radials was determined by use of the NGDC 30-Second database. Such determination of

elevation data is specifically permitted by Section 73.312(d) of the Commission's Rules.

The distances to the proposed service contour were also determined by computer using the FM Service [F(50,50)] program. A map, using the 1:1,000,000 series quadrangle map "Jacksonville", and depicting the coverage contours, is attached as Figure E-3.

#### Coverage of Principal Community

Baldwin, Florida is an incorporated community. Inasmuch as all areas within the city limits of Baldwin are within 3 km of the proposed transmitter site, and the proposed 70 dBu contour would encompass all areas within a minimum of 15.3 km of the transmitter site, complete compliance with Section 73.315(a) of the Rules is achieved.

#### Allocation Considerations

Footnote 3 to the Report and Order in MM Docket No. 87-77 indicates that the allocation of Channel 289A to Baldwin would "require a site restriction of 10.5 kilometers (6.5 miles)", and that the reference coordinates for Baldwin are "30-19-18 and 82-00-54". Our review of the Commission's FM data base, and the Baldwin, Florida 7-1/2" series quadrangle,

can find no justification for a site restriction of this magnitude; furthermore, the "reference coordinates" for Baldwin do not refer to any point within Baldwin's corporate limits. Using the grade-crossing of the north-south Seaboard rail line with U. S. 90 as a point of reference for Baldwin, the undersigned calculated an appropriate set of reference coordinates for Baldwin as: 30° 18' 09" N, 81° 58' 27" W.

With respect to restrictions of the use of Channel 28<sup>9A</sup> at Baldwin, the undersigned found that there are three existing allocations which impact on such use. They are: WSOS(FM), Channel 288A, St. Augustine, Florida; WOCL-FM, Channel 290C, DeLand, Florida; and WAPE-FM, Channel 236C, Jacksonville, Florida.

The proposed site is 72.3 km from first-adjacent channel Class A WSOS; 72 km is the required separation. The proposed site is 167.6 km from first-adjacent channel Class C WOCL; 165 km is required. The proposed site is 23.0 km from WAPE-FM under its facilities as a Class C1 in File No. BLH-5576 (22 km is required); it is 32.8 km from WAPE-FM's Class C facilities in File No. BPH-880330JA (29 km is required).

The Commission's data base indicates that a Petition for Rulemaking has been filed, looking toward the substitution of Channel 288C3 for Channel 288A at St. Augustine. However, this proposal was not a part of MM Docket No. 87-77, as a

counterproposal or for any other reason, and is not part of any pending docket proceeding pursuant to a Notice of Proposed Rulemaking. Thus, the proponent of this change to Section 73.202(b) of the Rules has no "cut-off" protection at the present time; certainly, footnote 3 to Docket No. 87-77 does not identify WSOS-FM as the station protected by any site restriction. Therefore, it is believed that, as a matter of law, the Channel 288C3 petition at St. Augustine is insufficient in and of itself to create a binding site restriction on Baldwin.

Thus, the site proposed herein is fully-spaced to all known allocations and existing stations.

However, out of an abundance of caution, First Coast Broadcasting Company requests any waiver of the Rules that the Commission might deem applicable to this situation, so that its application for Baldwin be duly considered.

#### Population and Area Data

The DataWorld population count computer program determined that the proposed 60 dBu contour encompasses 2,516.1 square km and 248,899 persons, pursuant to corrected 1980 Census data.

#### Environmental Matters

The instant proposal is not believed to be a major environmental action. The site is undeveloped real estate, covered at the present time with pine trees and brush. The

site is not part of any known officially-designated wilderness area or wildlife preserve. It is believed not hazardous to any endangered or threatened species, nor will any habitat for such species be significantly modified. The site is not in proximity to any districts, sites, buildings, structures or objects significant in American history, architecture, archaeology, engineering or culture. There is no known Indian religious site near the proposed transmitter site. Although there is low-lying, swampy ground in the Baldwin area, the proposed site is not located in such ground. Although clearing of the site and construction of a narrow, "two-track" road will be necessary, no significant "deforestation" will take place, and no wetland fill or water diversion is involved. Commercial forestry is a significant part of the local economy, and any excess cleared land will be replanted in pine.

The applicant does not propose "strobe" or other high intensity lighting for its tower.

The area around the proposed site is uninhabited, and, under ANSI standards, the proposed facility would not produce sufficient RF radiation to be a hazard to humans. In any event, a fence will be erected around the base of the tower and transmitter building.

#### Effect on Air Navigation

A request for a favorable determination of no hazard to

air navigation has been mailed to the FAA's Southern Regional Office at East Point, Georgia.

Auxiliary Power

The applicant proposes auxiliary power generation equipment at both the studio and transmitter sites.

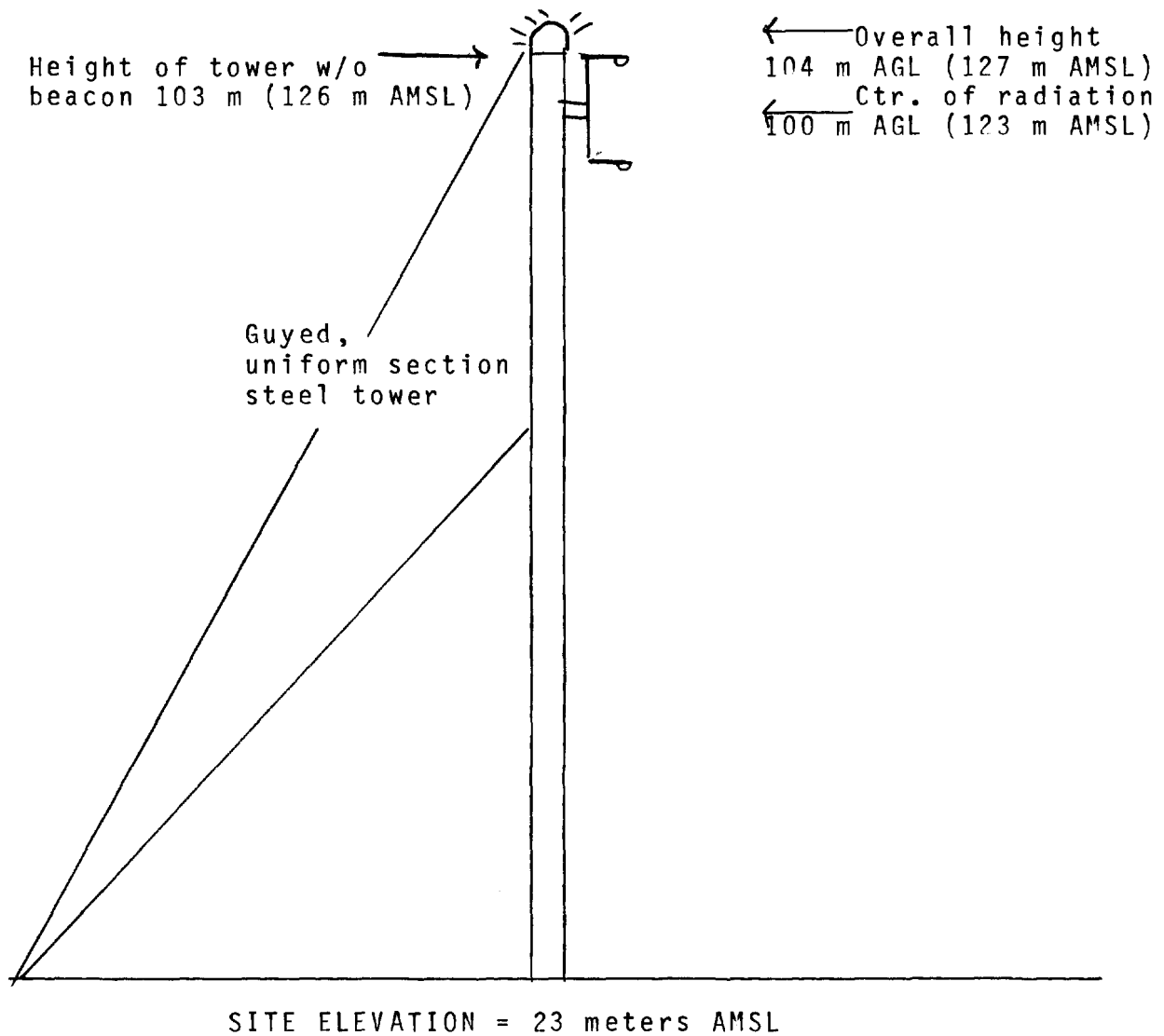
Conclusions

1. All of Baldwin, Florida will receive 70 dBu or better signal strength from the proposed facility.
2. The proposed tower construction would not have adverse effect on the environment.
3. The proposed operation is wholly consistent with the Commission's Rules as they appear to apply to the allocation of Channel 289A at Baldwin, Florida.

  
Dennis J. Kelly



FIRST COAST BROADCASTING COMPANY  
NEW FM, BALDWIN, FLORIDA  
EXHIBIT NO. E-1



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